

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:)
)
DELPHI CORPORATION, ET AL,)
) Case No. 05-44481
)
Debtor.)

MOTION TO LIFT AUTOMATIC STAY PROVISIONS OF 11 U.S.C. SECTION 362

Petitioner, Sandra Williams, respectfully moves this Honorable Court to enter an order lifting the automatic stay provision of 11 U.S.C. Section 362, and as grounds therefore would show:

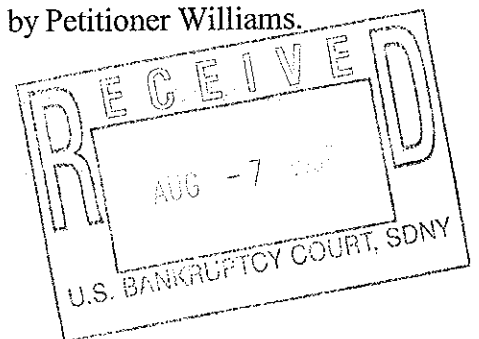
1. Debtor, Delphi Corporation filed its petition for relief under the provisions of Chapter 11 of Title 11 of the United States Code on October 8, 2005. Upon the filing, the automatic stay provisions of 11 U.S.C. Section 362(a) became effective.

2. Petitioner filed a workers compensation lawsuit against the debtor on February 15, 2008 in the Circuit Court of Etowah County, Alabama. This case style is Sandra Williams, Plaintiff vs. Delphi Corporation, Defendant, Civil Action Number CV-08-900065. Said lawsuit is currently pending in the Circuit Court of Etowah County, Alabama.

3. Petitioner, Sandra Williams' action against the defendant Delphi Corporation arises out of a work injury that occurred in May 2006. As a result of this work accident, Petitioner Williams has been caused to suffer a multiple physical and psychological injuries.

4. Petitioner believes that there is workers compensation insurance coverage on behalf of Delphi Corporation and is present which will pay on behalf of Delphi Corporation and should become legally obligated to pay for the above described damages sustained by Petitioner Williams.

WHEREFORE, petitioner prays:




1. That the automatic stay be lifted to permit the petitioner to proceed with her cause of action in the Circuit Court of Etowah County, Alabama; and

2. That the petitioner be permitted to recover against debtor to the extent of any money due petitioner by reason of debtor's workers compensation insurance policy or policies in force and effect at the time of the occurrences made the basis of the Circuit Court of Etowah County, Alabama cause of action (CV-08-900065).

3. That the debtor not be discharged in bankruptcy pending the outcome of plaintiff's lawsuit; and

4. Such other and future relief as this Court may deem just and proper under the circumstances.


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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2009, the foregoing was served upon the following by U.S. Mail postage prepaid:


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